

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CHRISTOPHER ROBINSON)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.:
)	
SPRING OAKS CAPITAL,)	
LLC, et. al.)	2:23-cv-01381-AMM
)	
Defendant.)	

**CHRISTOPHER ROBINSON’S EVIDENTIARY SUBMISSION IN
SUPPORT OF HIS RESPONSE IN OPPOSITION TO DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, the Plaintiff, Christopher Robinson ("Robinson") and relies on and files the following Exhibits in support of his Motion for Summary Judgment:

Exhibit 1: Deposition Transcript of Spring Oaks Capital Corporate Representative 30(b)(6) filed by Defendant as Ex. “A”, **(Doc. 44-1, pp. 1-46)**.

Ex. A-1: Calko Dep. Exhibit 1 – Rule 30(b)(6) Notice. **(Doc. 44-1, pp.47-54)**.

Ex. A-2: Calko Dep. Exhibit 2 – September 27, 2022 Letter to Spring Oaks (SOC_ROBINSON 000044). **(Doc. 44-1, p. 55)**.

Ex. A-3: Calko Dep. Exhibit 3 – October 31, 2022 Validation Packet Sent to Robinson (SOC_ROBINSON 000001-12). **(Doc. 44-1, pp.56-67)**.

Ex. A-4: Calko Dep. Exhibit 4 – Spring Oaks Account Notes (SOC_ROBINSON 000013-24). **(Doc. 44-1, pp.68-79).**

Ex. A-5: Calko Dep. Exhibit 5 – Account Statements (SOC_ROBINSON 000025-43). **(Doc. 44-1, pp.80-98).**

Ex. A-6: Calko Dep. Exhibit 6 – Excerpts from November 25, 2022 TransUnion Credit Report (Robinson v. Spring Oaks 000150, 202). **(Doc. 44-1, pp.99-100).**

Ex. A-7: Calko Dep. Exhibit 7 – Excerpts from July 28, 2023 TransUnion Credit Report (Robinson v. Spring Oaks 000004, 59-61). **(Doc. 44-1, pp.101-104).**

Ex. A-8: Calko Dep. Exhibit 8 – Excerpts from November 29, 2023 TransUnion Credit Report (Robinson v. Spring Oaks 000082, 119-120). **(Doc. 44-1, pp.105-107).**

Ex. A-9: Calko Dep. Exhibit 9 – Spring Oaks’ Responses to Robinson’s Discovery Requests. **(Doc. 44-1, pp.108-125).**

Ex. A-10: Calko Dep. Exhibit 10 – Excerpts from the Fair Debt Collection Practices Act. **(Doc. 44-1, pp.126-153).**

Ex. A-11: Calko Dep. Exhibit 11 – CDIA Credit Reporting Resource Guide. **(Doc. 44-1, pp.154-180).**

Exhibit 2: Spring Oaks Capital Responses to Written Discovery.

Exhibit 3: Deposition Transcript of Plaintiff, Christopher Robinson Filed by Defendant as Exhibit “B,”. **(Doc. 44-2, pp. 1-36).**

Ex. B-a: Robinson Dep. Exhibit A – April 5, 2022 Letter from Spring Oaks. **(Doc. 44-2, pp. 37-40).**

Ex. B-b: Robinson Dep. Exhibit B – September 27, 2022 Letter to Spring Oaks. **(Doc. 44-2, p. 41).**

Ex. B-c: Robinson Dep. Exhibit C – September 27, 2022 Letter to Spring Oaks. **(Doc. 44-2, pp. 42-43).**

Ex. B-d: Robinson Dep. Exhibit D – October 31, 2022 Validation

Packet Sent to Robinson. **(Doc. 44-2, pp. 44-64).**

Ex. B-e: Robinson Dep. Exhibit E – The Complaint. **(Doc. 44-2, pp. 65-76).**

Ex. B-f: Robinson Dep. Exhibit F – TransUnion Credit Report. **(Doc. 44-2, pp. 77-143).**

Ex. B-g: Robinson Dep. Exhibit G – Robinson’s Responses to Spring Oaks’ Discovery Requests. **(Doc. 44-2, pp. 144-165).**

Exhibit 4: Trans Union Credit Report dated 10/10/24 for Christopher Robinson Filed as Plaintiff’s Exhibit “4” to Plaintiff’s Motion for Partial Summary Judgment **(Doc. 47-1, pp. 1-4).**

Exhibit 5: Fee Agreement between Christopher Robinson and Watts & Herring, LLC, executed on June 19, 2024.

Respectfully submitted,

/s/ M. Stan Herring

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CERTIFICATE OF SERVICE

I hereby certify that on **October 31, 2024**, a copy of the foregoing has been served on the following counsel for by using the CM/ECF system, U.S. Mail, postage prepaid and properly addressed and/or email to the email addresses below:

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